



*Commonwealth of Virginia*

***VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY***

NORTHERN REGIONAL OFFICE

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April 1, 2019

By e-mail: [Emily.Baker@alexandriava.gov](mailto:Emily.Baker@alexandriava.gov)

**Receipt Confirmation Requested**

Ms. Emily Baker, Deputy City Manager  
City of Alexandria  
201 King Street, Suite 300  
Alexandria, Virginia 22314

RE: Joint Permit Application Number 19-0170  
Potomac Yard Metrorail Station, City of Alexandria, Virginia  
Additional Information Request Letter

Dear Ms. Baker:

The Virginia Department of Environmental Quality (DEQ) reviewed the additional information submittal dated March 11, 2019, as part of the February 6, 2019, Joint Permit Application (JPA) for the above-referenced project. The additional information submitted in response to DEQ's request letter dated February 25, 2019, including attachments such as the CDD #19, CDD #10, North Potomac Yard Small Area Plan (NPYSAP), and the Potomac Yard Concept Development Study Plan were instrumental to staff better understanding the complexities of the project. DEQ is evaluating your application in accordance with 9 VAC 25-210-10 et seq.

Based upon a review of the information, staff does not believe we have a complete alternative analysis that demonstrates Alternative B is the Least Environmental Damaging Practicable Alternative and we request the following to complete your application.

1. Provide an alternatives analysis for Alternative A and B-CSX based on a zoning scheme that would maximize the high-density, high-value, transient oriented development at each alternative location and compare this to Alternative B. The analysis should include, at a minimum:
  - A cost /revenue summary, including a comparison of each alternative and a statement as to whether each alternative is practicable based on cost, including revenue.
  - Graphics which depict alternative zoning layouts.
  - An evaluation of each alternative's ability to meet maximum access and ridership based on an achievable zoning which maximizes the performance alternative.
2. Provide the following information pertaining to the logistics and technology of Alternative A. The March 11 additional information response lists safety factors associated with Alternative A and states that it is

technologically possible to construct Alternative A but not practicable as a result of the hazards and uncertainties caused by the construction methods.

- Section 3.2.1.1 of the Analysis of Alternatives states that constructing Alternative A with the protective shell would require 48-weekend shutdowns ultimately delaying the project.
    - How long would Metrorail services have to be shut down to construct Alternative A without the protective shell? Is this practicable?
    - Can construction of Alternative A coincide with the Planned Metrorail Track Work shut down of the Blue and Yellow line from May 25 through September 3?
  - Alternative A was indicated to be technically feasible, assuming the construction of the protective shell, in the D/FEIS which was completed by WMATA. However, the March 11 submittal indicates that the project team is not aware of this construction practice occurring on other rail projects. Does the project team have the experience and expertise with rail line construction to conclude that this method of construction is not technologically or logistically practicable?
  - Provide a comparison of the specific safety concerns listed on pages 16-17 of the March 11 response as they pertain to Alternative B. For example, Alternative B cross-section (i.e. 448+00) provided in the March 11 submittal depict construction occurring within approximately 15 feet of the active lines. Given the proximity of Alternative B to the active rails it appears some of the safety concerns apply to both alternatives.
3. JPA pages 42 and 57, and the March 11 submittal indicate that Alternative A will have vibration impacts to residences that exceed WMATA and FTA Vibration Criteria. Do exceedances occur at other Metrorail station and rail projects? What are the consequences of exceeding WMATA and FTA Vibration Criteria? Please expand on this statement in terms of project practicability.
4. Provide the following information regarding the proposed temporary impacts:
- The additional information provides cross-sections for the permanent impact location. Provide cross-sections that include the temporary fill to be placed in wetlands.
  - DEQ has received numerous citizen concerns regarding impacts to the adjacent tidal wetlands. The limits of disturbance appear to be within 10 feet of the tidal wetland. Provide a description of what additional controls are planned to be utilized in the location closet to tidal wetlands to prevent to discharge of sediment.

Please be advised that upon receipt of the requested information, additional information may still be required for DEQ to reach a permit decision.

Please contact me by phone at (703) 583-3871 or by email at [Wynn.Prusaczyk@deq.virginia.gov](mailto:Wynn.Prusaczyk@deq.virginia.gov) if you have any questions or concerns regarding this request. Thank you for your cooperation in this matter.

Respectfully,



Wynn Prusaczyk  
VWP Permit Writer

Cc (by e-mail):

Ms. Loretta Cummings, Stantec Consulting Services Inc.  
Ms. Trisha Beasley, Department of Environmental Quality, Northern Regional Office  
Ms. Theresita Crockett-Augustine, U.S. Army Corps of Engineers, Northern VA Field Office  
Mr. Mark Eversole, Virginia Marine Resources Commission